

# BOYD | RICHARDS

August 30, 2021

(Via ECF)

Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

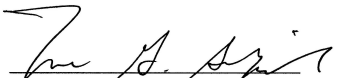
By **September 6, 2021**, Defendants shall submit a supplemental letter apprising the Court of (i) the number of documents produced by each party, (ii) the number of responsive documents currently in the possession of each party that have not been produced, (iii) the names and roles of any witnesses to be deposed and (iv) any interim discovery deadlines the parties have set, such as deadlines for interrogatories or requests to admit, and the status of the parties' compliance with those deadlines.

**Re:** *Kastrati v. M.E.G. Restaurant Enterprises Ltd., et al.*,  
Case No.: 21-cv-00481(LGS)

**Dated: August 31, 2021**

**New York, New York**

Dear Judge Schofield:



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

We represent the Defendants, M.E.G. Restaurant Enterprises Ltd. d/b/a Novita Restaurant (“Novita”), Marco Fregonese, and Elizabeth Yoshida (the “Defendants”), in the above-referenced action. We write regarding the current discovery deadlines and to request a stay.

I am one of four partners in the New York office which consists of nine attorneys in total. Several weeks ago, one of my partners went on maternity leave and is expected to be out for at least two months. Last week, another partner had a major surgery and is recovering in the hospital. He is expected to be on medical leave for at least three more weeks. Today, I was informed that another partner’s wife tested positive for COVID-19, and while that partner’s health remains uncertain, he will be out for an extended period to take care of their three young children.

Combining the above with my observance of the Jewish holidays, our office faces significant challenges in meeting the Court’s discovery deadline of September 17, 2021. We write, with Plaintiff’s counsel’s consent, to respectfully request that discovery be stayed until further notice, and we will provide the Court with a status within three weeks. In the interim, we request that the Court permit the parties to proceed with the Court-Ordered mediation.

We acknowledge that the parties have previously made two joint requests for an extension of the discovery deadlines; however, this is the Defendants’ first, sole request for a stay of all discovery deadlines. No other deadlines are affected by this request.

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We thank the Court for its consideration of this matter.

Respectfully,

  
Gary Ehrlich

cc: All Counsel (*via ECF*)

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